

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

BCS SOFTWARE, LLC,

Plaintiff

v.

ZOHO CORPORATION

Defendant

Case No. 6:21-cv-0051-ADA

JURY TRIAL DEMANDED

CASE READINESS STATUS REPORT

Plaintiff BCS Software, LLC (“Plaintiff”) and Defendant Zoho Corporation (“Defendant”) hereby provide the following status report in advance of the Case Management Conference (“CMC”).

FILING AND EXTENSIONS

Plaintiff’s Original Complaint was filed on January 19, 2021 [Dkt. No. 1]. There has been one extension for a total of 30 days for Defendant to file an answer or otherwise respond to Plaintiff’s Original Complaint [Dkt. No. 7a].

RESPONSE TO THE COMPLAINT

Defendant filed an Answer on March 18, 2021.

PENDING MOTIONS

There are currently no pending motions in this case. However, Defendant’s counsel has informed Plaintiff’s counsel that Defendant intends to file a motion for intra-district transfer to the Austin Division of the WDTX within the next week.

RELATED CASES IN THIS JUDICIAL DISTRICT

There are three (3) other active cases filed by Plaintiff on one or more of the asserted patents in this judicial district. These include the following cases:

Case	Case Filing Date
<i>BCS Software, LLC v. Codelathe Technologies, 6:20-cv-0027-ADA</i>	January 19, 2021
<i>BCS Software, LLC v. Rackspace US, Inc., 6:21-cv-0119-ADA</i>	February 4, 2021
<i>BCS Software, LLC v. OpenText, Inc., 6:21-cv-0050-ADA</i>	January 19, 2021

IPR, CBM, AND OTHER PGR FILINGS

There are no known IPR, CBM, or other PGR filings.

NUMBER OF ASSERTED PATENTS AND CLAIMS

In its Complaint, Plaintiff asserted Claims 1-3 of US Patent No. 8,819,120 against Defendant. Additional claims will be asserted and charted as part of Plaintiff's Preliminary Infringement Contentions.

APPOINTMENT OF TECHNICAL ADVISOR

The parties do not request appointment of a technical advisor to assist the Court with claim construction or other technical issues.

MEET AND CONFER STATUS

Counsel representing Plaintiff and Defendant conducted a meet and confer conference. Plaintiff believes that there are no pre-Markman issues to discuss at the CMC.

Dated: March 30, 2021

Respectfully Submitted

/s/ Thomas Fasone III

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